# UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

DR. JACK W. STAMPS,	§	
Plaintiff,	§	
	§	
v.	§	CIVIL ACTION NO. 1:20-CV-01204-LY
	§	
THE UNIVERSITY OF TEXAS AT	§	
AUSTIN,	§	
Defendant.	§	

## JOINT MOTION FOR PROTECTIVE ORDER

The Parties, having conferred among themselves, respectfully move this Court to enter the proposed Protective Order attached as Exhibit 1. In support of this Motion, the Parties state that:

- The Parties are engaging in discovery in this action in preparation for litigation in the above-styled cause.
- 2. The Parties acknowledge and agree that in the course of discovery, one or more of them may be called to produce documents that they believe are confidential in nature.
- 3. The proposed Protective Order is intended to provide protection relating to confidential information, documents, and materials containing the same.

Accordingly, the Parties respectfully request that the Court enter the proposed Protective Order.

Respectfully Submitted.

THORPE & HATCHER

By: /s/ Carla S. Hathcer

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/s/ William D. Wassdorf

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Counsel for Defendant

#### **CERTIFICATE OF CONFERENCE**

I hereby certify that on March 13, 2023, I conferred with counsel for Plaintiffs, who stated that Plaintiffs agree to join this motion.

/s/ William D. Wassdorf WILLIAM D. WASSDORF

### CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served on all counsel of record on March 17, 2023, via the court's electronic filing system.

/s/ William D. Wassdorf WILLIAM D. WASSDORF